

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EDMOND GRANT P/K/A “EDDY GRANT”,
GREENHEART MUSIC LIMITED, a United
Kingdom Limited Company, and
GREENHEART MUSIC LIMITED, an
Antigua and Barbuda Limited Company,

Plaintiffs,

-against-

DONALD J. TRUMP and DONALD J.
TRUMP FOR PRESIDENT, INC.,

Defendants.

Civil Action No. 1:20-cv-07103-JGK

**DEFENDANTS’ INITIAL
DISCLOSURES**

Pursuant to Rule 26(a)(1), Fed. R. Civ. P., Defendants Donald J. Trump (“Defendant Trump”) and Donald J. Trump For President, Inc. (“Defendant Company”) (collectively “Defendants”), by their undersigned attorneys, provide the following initial disclosures. Defendants reserve the right to supplement and/or amend these disclosures, to provide documents, witnesses, defenses, counterclaims and evidence in addition to these disclosures, to make any objections to witnesses or the admissibility of evidence and/or to take discovery in accordance with the Federal Rules of Civil Procedure and the Local Rules of this District. These disclosures are made without waiving any privilege claims or any other applicable objection or defense. Defendants make no admissions that any subject matter identified herein with respect to any particular individual category of documents and/or potential witness testimony is relevant to any party’s claims or defenses in this matter. These disclosures are not an admission as to the validity of any of Plaintiffs’ claims.

Exhibit 3

I. Witnesses

Below are the names and, if known, the addresses and telephone numbers of individuals likely to have discoverable information, along with the subjects of that information, that Defendants may use to support their claims or defenses, unless solely for impeachment, in this matter:

Name	Last Known Address	Subjects of Information Known
Daniel Scavino Jr. Former White House Deputy Chief of Staff for Communications and Director of Social Media; Former Director of Social Media for the Donald Trump 2016 presidential campaign.	Office of the 45th President of the United States 1100 S. Ocean Blvd Palm Beach, FL 33460 (914) 316-0805	(a) Defendant Trump's former social media accounts, generally; and (b) Publication of the Animation by Defendant's former Twitter account on August 12, 2020 (the "Tweet").
Will Ambruzs	9568 Lagersfield Cir Vienna VA, 22181 (512) 217-2171	(a) Creation of the Animation; (b) Use of the Song in the Animation; and (c) Publication of the Animation to his social media accounts.
Edmond Grant and/or other witnesses	To be determined.	(a) Ownership of the copyrights for the musical composition and sound recording entitled "Electric Avenue" (the "Composition" and the "Recording", respectively) (collectively, the "Song"); (b) Lyrics and composition of the Song; (c) Licensing and/or other agreements regarding use of the Song; (d) Plaintiffs' enforcement of their copyrights; and (e) Plaintiffs' claimed damages.

II. Documents

At this time, Defendants are unaware of any documents, electronically stored information, and/or tangible things in their possession, custody or control that are relevant to the claims or defenses in this matter.

III. Damages

Not applicable.

IV. Insurance

Not applicable.

These disclosures are made based on the information reasonably available to Defendants as of the date hereof. Defendants have not concluded their investigation of the facts relating to this case and have not completed formal discovery or preparation for trial. Accordingly, information may exist that Defendants do not yet have knowledge of or have not yet located, identified or reviewed. All of the foregoing disclosures are therefore based on such information currently known or available to Defendants after a reasonable inquiry pursuant to Federal Rule of Civil Procedure 26(a)(1)(E). Defendants reserve the right to alter, amend or supplement their disclosures herein pursuant to Federal Rule of Civil Procedure 26(e).

Dated: November 12, 2021
New York, New York

/s/ Darren W. Saunders_____

Darren W. Saunders
dsaunders@peroffsaunders.com
Mark I. Peroff
mark.peroff@peroffsaunders.com
Cassandra M. Tam
cassandra.tam@peroffsaunders.com
Jason H. Kasner
jkasner@peroffsaunders.com

PEROFF SAUNDERS P.C.
745 5th Avenue | Suite 500
New York, NY 10151
Tel: 646.898.2030

Kenneth Andrew Caruso
ken.caruso@mfsllp.com
MUKASEY FRENCHMAN & SKLAROFF LLP
2 Grand Central Tower
140 East 45th Street, 17th Floor
New York, NY 10017
Tel: 212.466.6400

Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the following document:

DEFENDANTS' INITIAL DISCLOSURES

was served on November 12, 2021, by electronic mail on counsel of record for Plaintiffs,
pursuant to Fed. R. Civ. P. 5(b)(2)(E) and by agreement of the parties:

Robert William Clarida
rclarida@reitlerlaw.com
Brian D. Caplan
bcaplan@reitlerlaw.com
Julie B. Wlodinguer
jwlodinguer@reitlerlaw.com
Reitler Kailas & Rosenblatt, L.L.C.
885 Third Avenue 20th Floor
New York, NY 10022-7604

Attorneys for Plaintiffs

By: /s/Cassandra M. Tam
Cassandra M. Tam